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Mr. Garcia
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:20-cr-00181-JAM-1
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13) **STATUS CONFERENCE AND EXCLUDE TIME**
MICHAEL GARCIA.) Date: July 30, 2024
14 Defendants.) Time: 9:00 a.m.
15) Judge: Hon. John A. Mendez
_____)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney Adrian Kinsella, counsel for
18 Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Michael Garcia that the status hearing currently set for
20 July 30, 2024 at 9:00 be continued to **September 24, 2024, at 9:00 a.m.**

21 The parties specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status on July 30, 2024 at 9:00 a.m.
23 2. By stipulation, Mr. Garcia now moves to continue the status conference to
24 September 24, 2024 at 9:00 a.m.
25 3. The government has produced roughly 2,000 pages and various video and audio
26 recordings in discovery.
27 4. Mr. Garcia requires additional time to review the discovery, investigate and
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research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial. The parties are continuing their efforts on plea negotiations.

5. Mr. Garcia believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between July 30, 2024 and September 24, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Garcia, and Ms. Garcia in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: July 19, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Garcia

Date: July 19, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Adrian Kinsella
Adrian Kinsella
Assistant United States Attorney
Attorneys for Plaintiff

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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

No further extensions will be granted absent good cause shown.

IT IS SO ORDERED.

Dated: July 22, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE